

## 2.0 BACKGROUND

### 2.1 Site Description

The Site consists of a former steel mill located on 7 Depot Road in South Windham, Maine (refer to Figure 1). The approximately 6.5 parcel is bordered by Depot Street acre to the North, Maine Central Railroad tracks to the east, the Presumpscot River to the South and Route 202 to the West. The site was reportedly first developed for industrial use in the 1700s, and over the years uses included a saw mill, grist mill, manufactured wood board mill and the steel mill whose remnants presently occupy the site.

The site is presently occupied by a former mill building constructed primarily of concrete and brick. The majority of the building consists of two levels, including a ground floor/basement that is partially below grade. Structures were added to the building over the years, and historic site plans denote the following uses: boiler house, generator room, press building, melt building, storage and manufacturing, and offices. The forge shop and boiler house have been razed.

### 2.2 Summary of Previous Investigation Activities

The property has been the focus of several environmental investigations since 1995. The investigation reports reviewed by Ransom include the following:

1. Phase I Limited Environmental Assessment, Lot 7 of Map 38, Windham Township, South Windham, Cumberland County, Maine, by Consla Geotechnical Engineering, March 18, 1993.
2. Environmental Site Assessment, Phase I & II, Former Steel Mill Property, Route 202 and Depot Street, Windham, Maine, by S.W. Cole Engineering, Inc., November 17, 1997.
3. Report on Supplemental Site Investigation, 7 Depot Street, Windham, Maine by Jacques Whitford Company, Inc., March 9, 2004.

The Phase I Limited Environmental Assessment by Consla Geotechnical Engineering identified potential sources of environmental impacts but included no subsurface investigation or chemical testing of soils, sludge or other materials at the Site. The assessment identified numerous tanks, chemical storage containers and operations areas that had the potential to impact the site environment.

Subsurface investigations by S. W. Cole in 1995 and 1996 included completion of twenty-four test pits targeting former storage tanks and other areas of potential concern. Soil samples were screened for volatile organic compounds (VOCs) with a photoionization detector (PID) and six soil samples were tested in a laboratory either for fuel oil, pesticides, PCBs, or heavy metals.

S. W. Cole identified heavy oil-impacted soil at the northern end of the site near Depot Street. The impacted soil was located in the vicinity of a two former above-ground heavy oil storage tanks (now removed). S. W. Cole removed approximately 11 tons of soil impacted by the heavy oil under the oversight of the MEDEP. S. W. Cole identified no significant impacts from pesticides, PCBs or heavy metals during their Site investigation.

In August, 2003, Jacques Whitford completed supplemental investigations including twelve test pits, six hand augers and twenty-three surface soil samples at the 7 Depot Street site to evaluate areas of potential concern identified during previous site investigations. These areas included:

- Two former above ground fuel storage tanks (15,000 and 10,000 gallon capacity) near the railroad tracks on the east side of the site where oil-stained soils were observed during a previous site investigation;
- Two 1,000 gallon underground wastewater tanks adjacent to the north wall of the facility;
- Former 3,000 gallon above-ground fuel tank located at the end of a rail spur on the east side of the site;
- Transformer pad/electrical substation on the south side of the site;
- Former drum storage area at the south end of the former mill building;
- Former garage at the south end of the site; and
- A sump and area of broken concrete in the basement of the former Melt Building.

Selected soil samples were tested for VOCs (EPA Method 8260-B), diesel-range organics (DRO), the eight RCRA metals, and PCBs. Sampling by Jacques Whitford also included testing of sludge and dirt/debris from floor surfaces inside the mill building for PCBs. The interior PCB sample locations Sampled by Jacques Whitford are shown on Figures 2 and 3, and included:

| Sample ID | Location/Rationale                                              |
|-----------|-----------------------------------------------------------------|
| SS5       | Material from area of broken concrete in Melt Building Basement |
| SS6       | Material from floor sump in Melt Building Basement              |
| SS7       | Sludge on concrete floor in maintenance shop, first floor       |
| SS8/SS9   | Sludge on concrete floor in maintenance shop, first floor       |
| SS10      | Sludge on concrete floor near former transformer, first floor   |
| SS101A/B  | Material from floor sump in Melt Building Basement              |
| SS102     | Dirt/debris pile on concrete floor in Melt Building Basement    |
| SS103     | Dirt/debris pile on concrete floor in Melt Building Basement    |
| SS104     | Dirt/debris pile on concrete floor in Melt Building Basement    |

Jacques Whitford collected sample SS5 from an area of broken concrete in the basement of the former Melt Building. Samples SS6 and SS101 were collected from a floor sump along the south wall in the Melt Building. The sump was about 1.5 ft x 1.5 ft square and contained water at a depth of about 2 ft below the floor level. Hand excavation along the building wall did not identify a discharge pipe from the drain. Jacques Whitford indicated that the drain may have an open bottom or sides under the building floor, with no point discharge.

Samples SS7, SS8/SS9 (co-located samples), SS10, SS102, SS103, and SS104 were composed of sludge that had accumulated on the building's concrete floor. Sample locations were selected based on proximity to oil stains, maintenance activities and former electrical equipment, such as transformers.

Total PCBs concentrations of 174 ppm (Aroclor 1254 and Aroclor 1260) were detected in material collected from the floor sump located along the south wall of the building basement/ground floor (SS6). Confirmatory sampling from this location indicated 262 ppm PCBs (SS101A) and 570 ppm PCBs (SS101B – split sample). The area of broken concrete (SS5) contained 77 mg/kg total PCBs.

Material sampled from the surface of the concrete floor inside the building contained total PCBs ranging from 11 ppm in the maintenance shop (SS8) to 138 ppm on the ground floor of the Melt Building (SS103). The PCBs detected included Aroclor 1254 and 1260.

### 2.3 Surrounding Receptors

Public water is available to the site area. However, Portland Water District records for South Windham indicate that a number of residences generally east of the site have private water supply wells. The closest wells to the site include the Boulanger, Georgatos and Reed residences, located about 500 to 1,000 feet to the northeast. Site topography indicates these residences are located at an elevation 20 to 40 feet higher than the site and are likely upgradient with respect to groundwater flow.

The Presumpscot River borders the site to the west, and properties to the north, east and south consist of a mix of commercial, industrial and residential properties. The closest residence to the site is an abutting apartment building about 300 feet east of the mill building. Ransom has identified no schools, playgrounds or day care facilities within 500 feet of the Site.



### 3.0 SITE CHARACTERIZATION BY RANSOM

Based on the results of the prior Site investigations, Ransom conducted additional characterization of materials inside the mill building for PCBs. The sampling program included the following:

1. Collection of surface wipe samples to assess possible tracking of PCBs into a first floor hallway and office/storage areas at the south end of the mill building.
2. Collection of bulk samples of solid material from the top of concrete floors in the basement and first floor of the Melt Building, the first floor Storage and Manufacturing area, the Press Building (ground floor) and press pit (ground floor);
3. Collection of bulk samples of oily material from the concrete floor and walls in the basement and first floor of the Melt Building, and from the first floor of the Storage and Manufacturing building;
4. Collection of sub-slab material where concrete had been broken in the vicinity of two transformers (in storage) on the first floor of the mill building; and
5. Collection of wood chips from oil-stained wood in the vicinity of electrical equipment in the basement (Generator Room) and first floor of the Melt Building.

The samples collected during Ransom's investigation were analyzed by Pace Analytical, Inc. (Pace) of Pittsburgh, PA for PCBs by U.S. EPA Method 8082. Bulk samples were extracted using US EPA Method 3540 (Soxhlet Extraction) and the wipe samples were extracted using a modified Method 3550 (sonication). The sample results are summarized on Table 1; laboratory data sheets including QA/QC reports are provided in Appendix B.

#### 3.1 Surface Wipe Samples

Ransom collected three surface wipe samples (IW-01 through IW-03) from concrete floors in a first floor hallway and in the office/laboratory space (second floor) at the south end of the mill building on October 27, 2005. Each sample was collected in accordance with the standard wipe test as defined by §761.123. Wipe sampling locations are depicted on Figures 3 and 4.

PCBs were not detected in wipe samples IW-02 (2<sup>nd</sup> floor office area) and IW-03 (1<sup>st</sup> floor hall). Aroclor 1254 and Aroclor 1260 were detected at a total concentration of 44 µg/100 cm<sup>2</sup> in IW-01 (2<sup>nd</sup> floor stockroom).

#### 3.2 Bulk Solids on Walls and Floors

Ransom collected ten samples of bulk solids from the top of concrete floors in the former mill building on October 27 and November 2, 2005 (refer to Figures 2 and 3). The samples included:

- Melt Building basement (IS-09 and duplicate IS-13)
- First floor of the Melt Building (IS-10, IS-11 and IS-14)
- Ground floor of the Storage and Manufacturing area (IS-06)
- First floor of the Storage and Manufacturing area (IS-01 and IS-02)
- Press Building (IS-07 and IS-08).



Total PCBs were detected at concentrations ranging from non-detect in the Press Building (IS-08) to 320 mg/kg on the first floor of the Storage and Manufacturing area (IS-02). Four of the ten samples contained total PCBs with concentrations greater than 50 mg/kg. The PCBs detected were Aroclor 1248, 1254 and 1260.

### 3.3 Oily Material

Ransom collected six samples of oily material associated with fuel distribution piping in the Melt Building. The piping includes fuel supply and return lines extending from the south end of the Melt Building basement to the Storage and Manufacturing area at the north end of the mill building. The oil samples appeared to consist of a heavy heating oil (No. 6/Bunker C) and included:

- Oil on the wall of the Melt Building basement, near fuel piping (IS-03)
- Oil on the concrete floor beneath a fuel pipe cutoff (IS-04)
- Oil on the wall of a former furnace in the basement of the Melt Building (IS-15)
- Oil that had leaked from a fuel pipe fitting on the first floor of the Melt Building (IS-16)
- Oil that had leaked from a fuel piping elbow on the first floor of the Melt Building (IS-17)
- Oil that had leaked from a fitting in an apparent fuel pump on the first floor of the Storage and Manufacturing area (IS-18).

Samples IS-03 and IS-04 were collected on October 27, 2005. Samples IS-15 through IS-18 were collected on January 2, 2006. The sample the locations are shown on Figures 2 and 3.

Total PCBs in the oily materials were detected at concentrations ranging from non-detect in IS-18 to 240 mg/kg in IS-15. Two of the six samples of oil materials contained PCBs at concentrations greater than 50 mg/kg. PCB constituents included Aroclor 1242, Aroclor 1248 and Aroclor 1254.

### 3.4 Sub-Slab Sample

Ransom collected one bulk sub-slab sample (IS-05) of fill from an area of broken concrete flooring in the Storage and Manufacturing area on October 27, 2005. The sample location is shown on Figure 2.

The soil sample contained total PCBs at a concentration of 97 mg/kg. The constituents were Aroclor 1254 (66 mg/kg) and Aroclor 1260 (31 mg/kg).

### 3.5 Bulk Wood Samples

Ransom collected two samples of oil-stained wood in transformer areas, one from a platform in the former Generator Room (IWD-02), and one from a platform on the first floor of the Melt Building (IWD-01). Sample locations are shown on Figures 2 and 3.

The two wood chip samples contained total PCBs of 36.9 mg/kg (IWD-01) and 105 mg/kg (IWD-02). Aroclor 1242, 1254 and 1260 were identified.

### 3.6 Data Usability/Validation

To assess the usability/validity of the laboratory data obtained during the investigation work described above, Ransom conducted a limited data validation assessment. This assessment included an evaluation of the following parameters as provided in the laboratory reports:

1. Sample integrity;
2. Laboratory information;
3. Chain of custody;
4. Laboratory report details; and
5. Quality Assurance/Quality Control.

During the validation process, Ransom reviewed the laboratory analytical reports and completed a Laboratory Report Checklist documenting the performance of the validation. Ransom did not identify laboratory quality-control issues that may have had an adverse impact on the usability of the data.

### 3.7 Determination of PCB Remediation Waste

The concentration of PCBs in bulk materials sampled inside the mill building to date range from non-detect to 570 mg/kg. Fifteen of the thirty samples collected exhibited total PCB concentrations greater than 50 mg/kg. The source of PCBs at the site is likely a combination of spills and leaks of PCB-MODF from transformers and other electrical equipment, PCB-containing lubricating/hydraulic oils and PCB-contaminated fuel oil. Given uncertainty of the source, date of use and original concentration of PCBs in equipment in the mill building, sludge, dirt/debris and oily material on the floors and walls of the mill building will be presumed to be "PCB Remediation Wastes."

### 3.8 Quantity of PCB Remediation Waste

The quantity of PCB remediation waste has been estimated based on visual assessment of approximate material thickness and square footage of areas covered with sludge, dirt/debris and oily material. The table below summarizes the estimates.

| Location                                                    | Estimated Impacted Area (sq. ft.) | Estimated Thickness (in) | Estimated Volume (cubic yards) |
|-------------------------------------------------------------|-----------------------------------|--------------------------|--------------------------------|
| Maintenance Shop Area                                       | 4,200                             | 0.5                      | 6.5                            |
| Melt Building- ground                                       | 10,000                            | 0.5                      | 15                             |
| Melt Building - 1 <sup>st</sup>                             | 10,000                            | 0.5                      | 15                             |
| Storage & Manufacturing - ground                            | 6,000                             | 0.25                     | 4.7                            |
| Storage & Manufacturing - 1 <sup>st</sup>                   | 6,000                             | 0.25                     | 4.7                            |
| Generator Room                                              | 400                               | 0.25                     | 0.3                            |
| Fuel piping in Melt Building and Storage/Manufacturing Area | Not Applicable                    | Not Applicable           | 10                             |
| Estimated Total (cubic yards)                               |                                   |                          | 56.2                           |

Specific PCB-contaminated locations are not delineated on the site plans due to the virtual ubiquitous presence of these materials within the mill building. As a result, sludge, dirt/debris and oily materials on floors, walls and in fuel piping will be presumed contaminated with PCBs (>1 ppm) and will be removed for proper disposal at a PCB disposal facility.

## 4.0 CLEANUP PLAN

### 4.1 Objective

The objective of the cleanup activities conducted under this Plan is to remove sludge, dirt/debris and oily material from the concrete flooring and walls of the former mill building, and to remove piping that contains heavy fuel oil contaminated with PCBs. Following removal of this material, additional characterization of underlying concrete and soils will be conducted, and self-implementation plans will be submitted to EPA for subsequent mitigation. The mill building is proposed to be demolished for site redevelopment.

### 4.2 Cleanup Goal

It is assumed that sludge, dirt/debris, oily material and associated fuel piping contain PCB concentrations greater than 1 mg/kg. Accordingly, this material will be collected and properly disposed as PCB Remediation Waste.

### 4.3 Public Notification

Ransom will notify the U.S. EPA, MEDEP, and the Windham Town Manager regarding the performance of the work prior to implementation of the Plan.

### 4.4 Necessary Permits

Ransom has submitted a Voluntary Response Action Plan to MEDEP and has received approval for site mitigation. Ransom has identified no other permit requirements.

### 4.5 Sludge, dirt/debris and Oily Material Removal

Ransom will be on-site to oversee contractor removal of sludge, dirt/debris, oily material and associated piping from the mill building. Depending on the consistency of the material, PCB waste will be recovered using either a vacuum equipped with a HEPA-filter, or by shoveling into storage containers (e.g., hardened sludge and oily materials). Dust suppression, such as application of a spay mist, will be implemented on an as-needed basis.

For oil-stained concrete surfaces, the contractor may apply a petroleum-based agent (e.g., #2 fuel oil) to assist in removing residual PCB contamination. Applied liquids and residuals will be contained with plastic sheeting and absorbent pads.

Collected materials will be stored in labeled 55-gallon drums or roll-off containers. The containers will be kept closed except during transfer of waste to the containers. Used HEPA filters and containment materials (i.e., plastic sheeting, tape, lumber) will be managed as PCB Remediation Waste. Following appropriate waste characterization activities, the PCB Remediation Waste is scheduled to be disposed at The Wayne Disposal in Belleville, Michigan.

### 4.6 Confirmatory Sampling and Cleanup Verification

Following the removal of the PCB-contaminated sludge, dirt/debris, oily materials and associated piping from the mill building, Ransom will conduct sampling of the underlying concrete to assess the



potential for residual PCBs. Samples will be collected in visibly stained areas and other locations where PCBs were identified during bulk sample characterization. Sampling will be conducted in accordance with EPA's "draft Standard Operating Procedure for Sampling Concrete in the Field," dated December 1, 1997. Sampling frequency will be assigned based on §761.265, "Sampling Bulk PCB Remediation Waste and Porous Surfaces." If PCBs are identified at concentrations greater than 1 mg/kg, a plan for mitigation of the concrete will be prepared and submitted to EPA.

#### 4.7 Contingencies

The proposed PCB mitigation plan is inherently conservative in that sludge, dirt/debris and oily materials encountered within the mill building is assumed to be PCB Remediation Waste with total PCB concentrations >50 ppm. The greatest uncertainty is the volume of the material that will be collected, stored and disposed off site. Our client and the contractor are prepared to collect and properly dispose of additional PCB Remediation Waste if actual volumes exceed the estimates detailed herein.

## 5.0 PROPOSED IMPLEMENTATION SCHEDULE

Ransom proposes the following implementation schedule for the Plan:

| Activity                           | Completion Date |
|------------------------------------|-----------------|
| Submittal of Plan                  | April 28, 2006  |
| US. EPA Approval (expected)        | May 28, 2006    |
| Interior Building Material Removal | June-July 2006  |

**TABLES**

**VIL\_RESP02298**



**TABLE 1: PCB Sample Results**  
**Interior of Keddy Mill**  
**South Windham, Maine**

|              | Sample Identifier | SS5                                        | SS6                                       | SS7                                           | SS8                                           | SS9                                           | SS10                                    | SS101A                                    | SS101B                                    | SS102                                                  | SS103                                                  | SS104                                                  |
|--------------|-------------------|--------------------------------------------|-------------------------------------------|-----------------------------------------------|-----------------------------------------------|-----------------------------------------------|-----------------------------------------|-------------------------------------------|-------------------------------------------|--------------------------------------------------------|--------------------------------------------------------|--------------------------------------------------------|
|              | Sample Type       | Soil/Solids                                | Soil/Solids                               | Sludge/Solids                                 | Sludge/Solids                                 | Sludge/Solids                                 | Sludge/Solids                           | Soil/Solids                               | Soil/Solids                               | Soil/Solids                                            | Soil/Solids                                            | Soil/Solids                                            |
|              | Location          | Basement,<br>Area of<br>Broken<br>Concrete | Basement,<br>Floor Sump,<br>Melt Building | 1 <sup>st</sup> floor,<br>Maintenance<br>Shop | 1 <sup>st</sup> floor,<br>Maintenance<br>Shop | 1 <sup>st</sup> floor,<br>Maintenance<br>Shop | 1 <sup>st</sup> floor, Melt<br>Building | Basement,<br>Floor Sump<br>(split sample) | Basement,<br>Floor Sump<br>(split sample) | Basement,<br>Dirt/Debris on<br>Floor, Melt<br>Building | Basement,<br>Dirt/Debris on<br>Floor, Melt<br>Building | Basement,<br>Dirt/Debris on<br>Floor, Melt<br>Building |
|              | Result Units      | mg/kg                                      | mg/kg                                     | mg/kg                                         | mg/kg                                         | mg/kg                                         | mg/kg                                   | mg/kg                                     | mg/kg                                     | mg/kg                                                  | mg/kg                                                  | mg/kg                                                  |
| PCBs         | Collection Date   | 25-Nov-03                                  | 25-Nov-03                                 | 25-Nov-03                                     | 25-Nov-03                                     | 25-Nov-03                                     | 25-Nov-03                               | 13-Jan-04                                 | 13-Jan-04                                 | 13-Jan-04                                              | 13-Jan-04                                              | 13-Jan-04                                              |
| Aroclor-1016 |                   | < 39.2                                     | < 48.2                                    | < 33.1                                        | < 54.6                                        | 3.2                                           | < 43.9                                  | <4.41                                     | <31                                       | <6.68                                                  | <29.8                                                  | <29.9                                                  |
| Aroclor-1221 |                   | < 39.2                                     | < 48.2                                    | < 33.1                                        | < 54.6                                        | < 47.6                                        | < 43.9                                  | <4.41                                     | <31                                       | <6.68                                                  | <29.8                                                  | <29.9                                                  |
| Aroclor-1232 |                   | < 39.2                                     | < 48.2                                    | < 33.1                                        | < 54.6                                        | < 47.6                                        | < 43.9                                  | <4.41                                     | <31                                       | <6.68                                                  | <29.8                                                  | <29.9                                                  |
| Aroclor-1242 |                   | < 39.2                                     | < 48.2                                    | < 33.1                                        | < 54.6                                        | < 47.6                                        | < 43.9                                  | <4.41                                     | <31                                       | <6.68                                                  | <29.8                                                  | <29.9                                                  |
| Aroclor-1248 |                   | < 39.2                                     | < 48.2                                    | < 33.1                                        | < 54.6                                        | < 47.6                                        | < 43.9                                  | <4.41                                     | <31                                       | <6.68                                                  | <29.8                                                  | <29.9                                                  |
| Aroclor-1254 |                   | 45                                         | 120                                       | 13                                            | 11                                            | 10                                            | 5.1                                     | 262                                       | 570                                       | 71.1                                                   | 138                                                    | 100                                                    |
| Aroclor-1260 |                   | 32                                         | 54                                        | < 33.1                                        | < 54.6                                        | 3.5                                           | < 43.9                                  | <4.41                                     | <31                                       | <6.68                                                  | <29.8                                                  | <29.9                                                  |
| PCB Total    |                   | 77                                         | 174                                       | 13                                            | 11                                            | 16.7                                          | 5.1                                     | 262                                       | 570                                       | 71.1                                                   | 138                                                    | 100                                                    |

Notes:

NA = Not available

µg = microgram

mg/kg = milligram per kilogram

PCBs = Polychlorinated Biphenyls

J = Estimated value

VIL\_RESP02299

TABLE 1: PCB Sample Results  
Interior of Keddy Mill  
South Windham, Maine

|              | Sample Identifier | IW-01                            | IW-02                              | IW-03                                               | IWD-01                               | IWD-02                   | IS-01                                          | IS-02                                          | IS-03                        | IS-04                                        | IS-05                                 | IS-06                                 |
|--------------|-------------------|----------------------------------|------------------------------------|-----------------------------------------------------|--------------------------------------|--------------------------|------------------------------------------------|------------------------------------------------|------------------------------|----------------------------------------------|---------------------------------------|---------------------------------------|
|              | Sample Type       | Wipe                             | Wipe                               | Wipe                                                | Wood                                 | Wood                     | Sludge/ Solids                                 | Sludge/ Solids                                 | Oily Material                | Oily Material                                | Sub-Slab Sample                       | Sludge/ Solids                        |
|              | Location          | 2 <sup>nd</sup> floor, Stockroom | 2 <sup>nd</sup> floor, Office Area | 1 <sup>st</sup> floor Hall Outside Maintenance Shop | 1 <sup>st</sup> floor, Melt Building | Basement, Generator Room | 1 <sup>st</sup> floor, Storage & Manufacturing | 1 <sup>st</sup> floor, Storage & Manufacturing | Basement, Melt Building Wall | Basement, Melt Building, Beneath Pipe Cutoff | Ground floor, Storage & Manufacturing | Ground floor, Storage & Manufacturing |
|              | Result Units      | µg                               | µg                                 | µg                                                  | mg/kg                                | mg/kg                    | mg/kg                                          | mg/kg                                          | mg/kg                        | mg/kg                                        | mg/kg                                 | mg/kg                                 |
| PCBs         | Collection Date   | 27-Oct-05                        | 27-Oct-05                          | 27-Oct-05                                           | 27-Oct-05                            | 2-Nov-05                 | 27-Oct-05                                      | 27-Oct-05                                      | 27-Oct-05                    | 27-Oct-05                                    | 27-Oct-05                             | 27-Oct-05                             |
| Aroclor-1016 |                   | <5.0                             | <5.0                               | <5.0                                                | <2.2                                 | <7.0                     | <4.5                                           | <41                                            | <1.0                         | <1.1                                         | <3.9                                  | <5.3                                  |
| Aroclor-1221 |                   | <5.0                             | <5.0                               | <5.0                                                | <2.2                                 | <7.0                     | <4.5                                           | <41                                            | <1.0                         | <1.1                                         | <3.9                                  | <5.3                                  |
| Aroclor-1232 |                   | <5.0                             | <5.0                               | <5.0                                                | <2.2                                 | <7.0                     | <4.5                                           | <41                                            | <1.0                         | <1.1                                         | <3.9                                  | <5.3                                  |
| Aroclor-1242 |                   | 3 J                              | <5.0                               | <5.0                                                | 17                                   | 71                       | <4.5                                           | <41                                            | 3.6                          | 1.7                                          | <3.9                                  | <5.3                                  |
| Aroclor-1248 |                   | <5.0                             | <5.0                               | <5.0                                                | <2.2                                 | <7.0                     | <4.5                                           | <41                                            | <1.0                         | <1.1                                         | <3.9                                  | 35                                    |
| Aroclor-1254 |                   | 24                               | <5.0                               | <5.0                                                | 12                                   | 34                       | 89                                             | 320                                            | 3.2                          | 8.5                                          | 66                                    | 62                                    |
| Aroclor-1260 |                   | 17                               | <5.0                               | <5.0                                                | 7.9                                  | <7.0                     | <4.5                                           | <41                                            | <1.0                         | <1.1                                         | 31                                    | 27                                    |
| PCB Total    |                   | 44                               | <5.0                               | <5.0                                                | 36.9                                 | 105                      | 89                                             | 320                                            | 6.8                          | 10.2                                         | 97                                    | 124                                   |

Notes:

NA = Not available

µg = microgram

mg/kg = milligram per kilogram

PCBs = Polychlorinated Biphenyls

J = Estimated value

VIL\_RESP02300

**TABLE 1: PCB Sample Results**  
**Interior of Keddy Mill**  
**South Windham, Maine**

|              | Sample Identifier | IS-07                              | IS-08                                  | IS-09                                   | IS-10                                      | IS-11                                      | IS-13                 | IS-14                                   | IS-15                     | IS-16                       | IS-17                       | IS-18                                       | Equip. Blank     |
|--------------|-------------------|------------------------------------|----------------------------------------|-----------------------------------------|--------------------------------------------|--------------------------------------------|-----------------------|-----------------------------------------|---------------------------|-----------------------------|-----------------------------|---------------------------------------------|------------------|
|              | Sample Type       | Sludge/<br>Solids                  | Sludge/<br>Solids                      | Sludge/<br>Solids                       | Sludge/<br>Solids                          | Sludge/<br>Solids                          | Sludge/<br>Solids     | Sludge/<br>Solids                       | Oily<br>Materials         | Oily<br>Materials           | Oily<br>Materials           | Oily Materials                              | Aqueous          |
|              | Location          | Ground floor,<br>Press<br>Building | Ground<br>floor, Press<br>Building Pit | Basement,<br>adjacent to<br>Main Stairs | 1 <sup>st</sup> floor,<br>Melt<br>Building | 1 <sup>st</sup> floor,<br>Melt<br>Building | Duplicate of<br>IS-09 | 1 <sup>st</sup> floor, Melt<br>Building | Basement,<br>Furnace Wall | 1st Floor,<br>Melt Building | 1st Floor,<br>Melt Building | Ground floor,<br>Storage &<br>Manufacturing | Rinsate<br>Blank |
|              | Result Units      | mg/kg                              | mg/kg                                  | mg/kg                                   | mg/kg                                      | mg/kg                                      | mg/kg                 | mg/kg                                   | mg/kg                     | mg/kg                       | mg/kg                       | mg/kg                                       | µg/l             |
| PCBs         | Collection Date   | 27-Oct-05                          | 27-Oct-05                              | 2-Nov-05                                | 27-Oct-05                                  | 2-Nov-05                                   | 2-Nov-05              | 2-Nov-05                                | 2-Jan-06                  | 2-Jan-06                    | 2-Jan-06                    | 2-Jan-06                                    | 27-Oct-05        |
| Aroclor-1016 |                   | <1.0                               | <1.0                                   | <1.0                                    | <6.0                                       | <3.4                                       | <1.0                  | <5.2                                    | <26                       | <6.3                        | <4.9                        | <5.0                                        | <1.0             |
| Aroclor-1221 |                   | <1.0                               | <1.0                                   | <1.0                                    | <6.0                                       | <3.4                                       | <1.0                  | <5.2                                    | <26                       | <6.3                        | <4.9                        | <5.0                                        | <1.0             |
| Aroclor-1232 |                   | <1.0                               | <1.0                                   | <1.0                                    | <6.0                                       | <3.4                                       | <1.0                  | <5.2                                    | <26                       | <6.3                        | <4.9                        | <5.0                                        | <1.0             |
| Aroclor-1242 |                   | <1.0                               | <1.0                                   | <1.0                                    | <6.0                                       | <3.4                                       | <1.0                  | <5.2                                    | <26                       | <6.3                        | 5.1                         | <5.0                                        | <1.0             |
| Aroclor-1248 |                   | <1.0                               | <1.0                                   | 2.2                                     | <6.0                                       | 15                                         | 2                     | <5.2                                    | 240                       | 110                         | <4.9                        | <5.0                                        | <1.0             |
| Aroclor-1254 |                   | 1.8                                | <1.0                                   | 3.6                                     | 41                                         | 39                                         | 2.9                   | 27                                      | <26                       | <6.3                        | <4.9                        | <5.0                                        | <1.0             |
| Aroclor-1260 |                   | <1.0                               | <1.0                                   | <1.0                                    | <6.0                                       | 15                                         | <1.0                  | <5.2                                    | <26                       | <6.3                        | <4.9                        | <5.0                                        | <1.0             |
| PCB Total    |                   | 1.8                                | <1.0                                   | 5.8                                     | 41                                         | 69                                         | 4.9                   | 27                                      | 240                       | 110                         | 5.1                         | <5.0                                        | <1.0             |

Notes:

NA = Not available

µg = microgram

mg/kg = milligram per kilogram

PCBs = Polychlorinated Biphenyls

J = Estimated value

VIL\_RESP02301



**FIGURES**

**VIL\_RESP02302**



TAKEN FROM U.S.G.S. 7.5x15 MINUTE SERIES TOPOGRAPHIC  
MAP OF GORHAM, MAINE DATED 1975

CONTOUR INTERVAL IS 3 METERS

SITE COORDINATES: LATITUDE 43°44'06"  
LONGITUDE 70°25'32"

UTM COORDINATES: 48: 43: 165mN  
03: 85: 220mE



SCALE in FEET  
1: 25,000

**RANSOM**

Environmental  
Consultants, Inc.

### SITE LOCATION MAP

PREPARED FOR:

SITE:

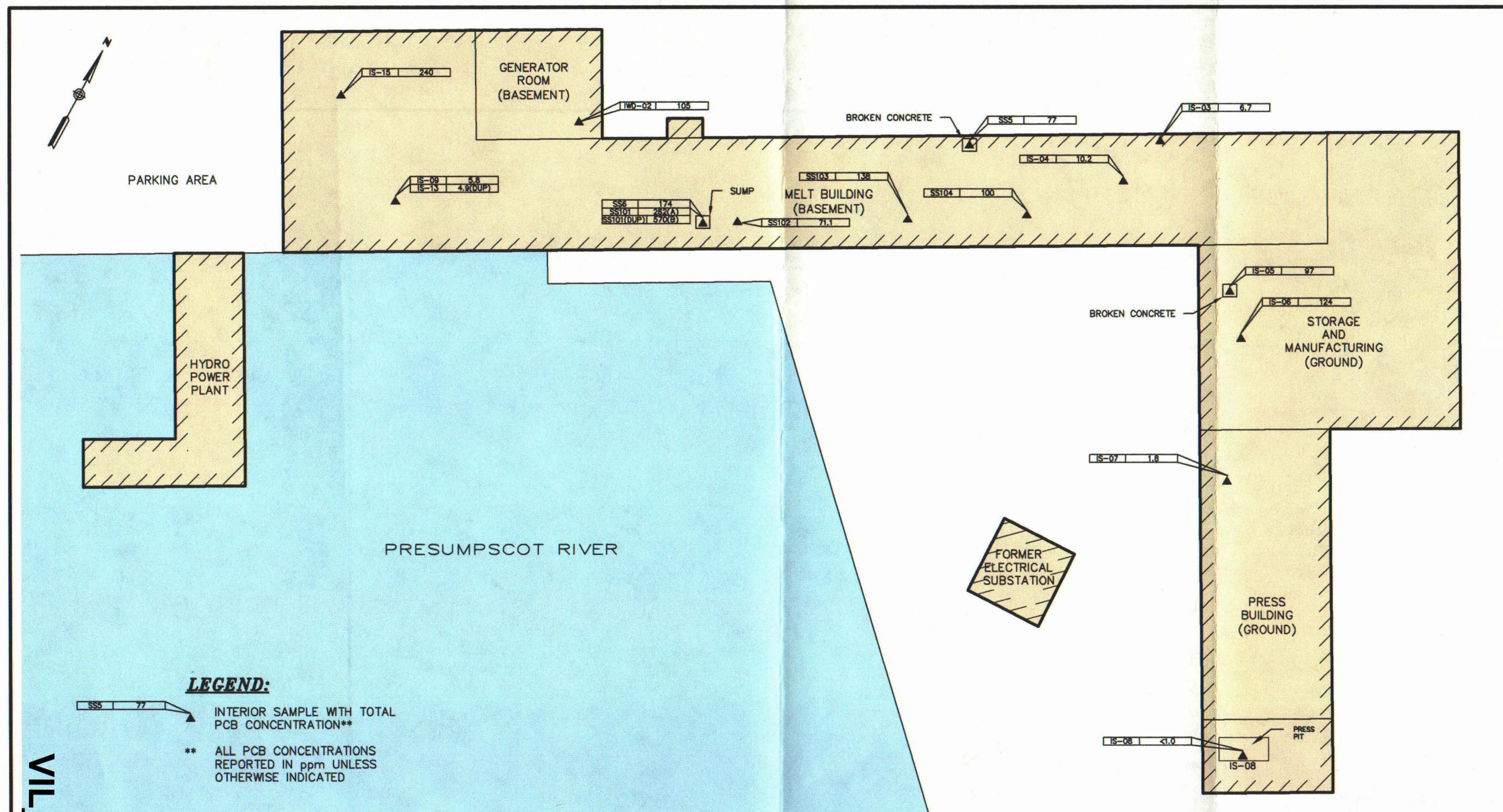
VILLAGE AT LITTLE FALLS, LLC  
PORTLAND, MAINE

7 DEPOT STREET  
WINDHAM, MAINE

DATE: APRIL 2006  
PROJECT: 046016  
FIGURE: 1

VIL\_RESP02303



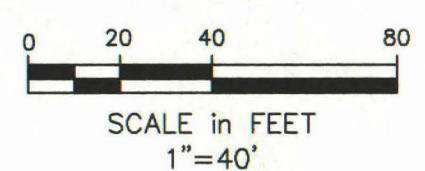


**NOTES:**

1. SITE PLAN BASED ON DRAWING FROM JACQUES WHITFORD COMPANY, INC. DATED SEPTEMBER 2, 2003.

2. SOME FEATURES ARE APPROXIMATE IN LOCATION AND SCALE.

3. THIS PLAN HAS BEEN PREPARED FOR VILLAGE AT LITTLE FALLS, LLC. ALL OTHER USES ARE NOT AUTHORIZED, UNLESS WRITTEN PERMISSION IS OBTAINED FROM RANSOM ENVIRONMENTAL CONSULTANTS, INC.

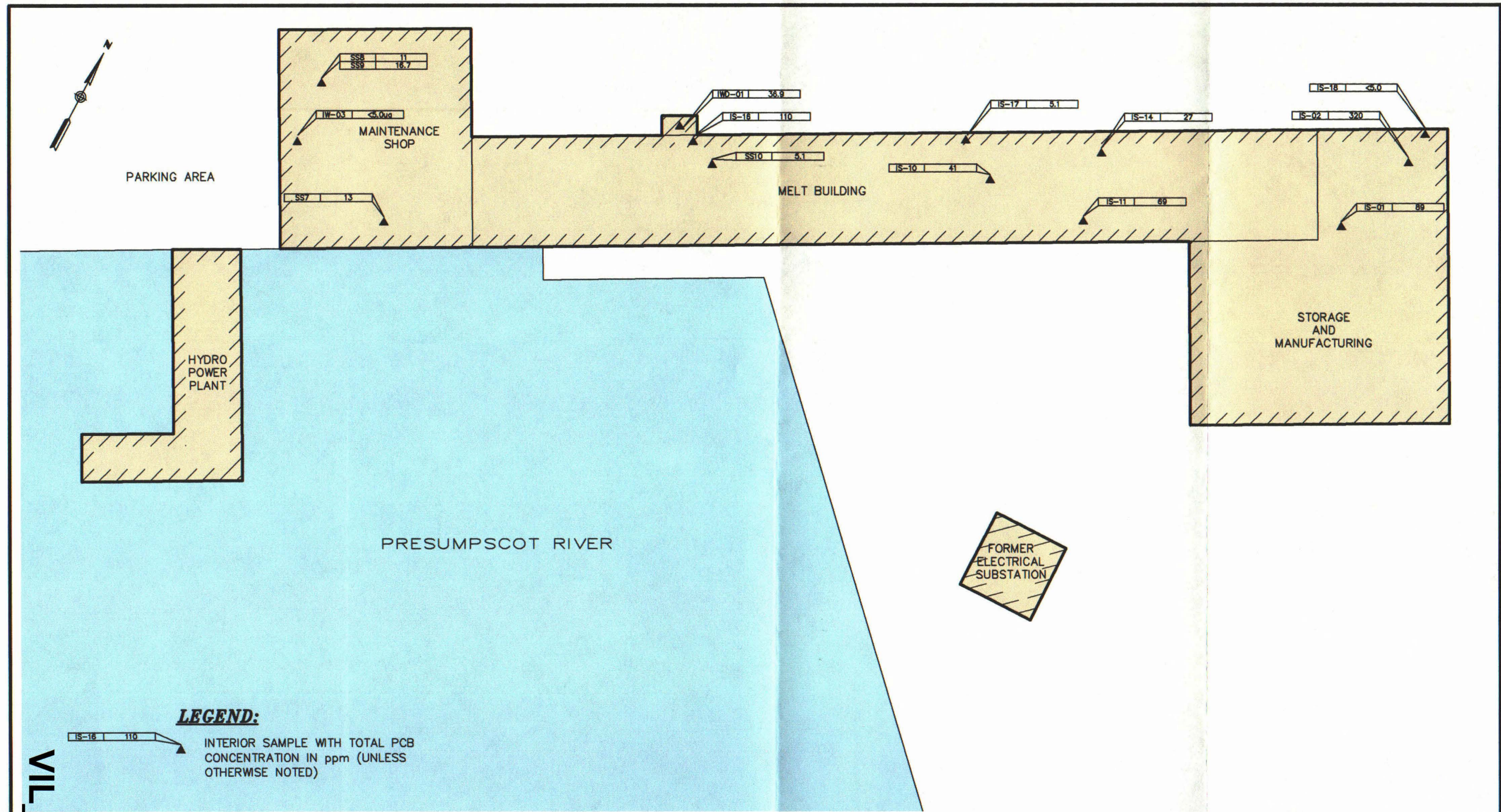


P:\ME-GWGS\2004\046016\04601605.dwg Apr 27, 2006 - 9:02am

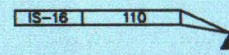
|                                                                  |  |                                                      |            |
|------------------------------------------------------------------|--|------------------------------------------------------|------------|
| <b>RANSOM</b> Environmental Consultants, Inc.                    |  | <b>PCB SAMPLE RESULTS: BASEMENT AND GROUND FLOOR</b> |            |
| PREPARED FOR:<br>VILLAGE AT LITTLE FALLS, LLC<br>PORTLAND, MAINE |  | SITE:<br>7 DEPOT STREET<br>WINDHAM, MAINE            |            |
|                                                                  |  | DATE:                                                | APRIL 2006 |
|                                                                  |  | PROJECT:                                             | 046016-03  |
|                                                                  |  | FIGURE:                                              | 2          |

VIL-RESP02304





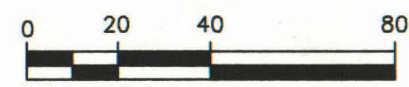
**LEGEND:**



INTERIOR SAMPLE WITH TOTAL PCB  
CONCENTRATION IN ppm (UNLESS  
OTHERWISE NOTED)

**NOTES:**

1. SITE PLAN BASED ON DRAWING FROM JACQUES WHITFORD COMPANY, INC.  
DATED SEPTEMBER 2, 2003.
2. SOME FEATURES ARE APPROXIMATE IN LOCATION AND SCALE.
3. THIS PLAN HAS BEEN PREPARED FOR VILLAGE AT LITTLE FALLS, LLC. ALL  
OTHER USES ARE NOT AUTHORIZED, UNLESS WRITTEN PERMISSION IS  
OBTAINED FROM RANSOM ENVIRONMENTAL CONSULTANTS, INC.



SCALE in FEET  
1"=40'

**RANSOM** Environmental  
Consultants, Inc.

PREPARED FOR:  
VILLAGE AT LITTLE FALLS, LLC  
PORTLAND, MAINE

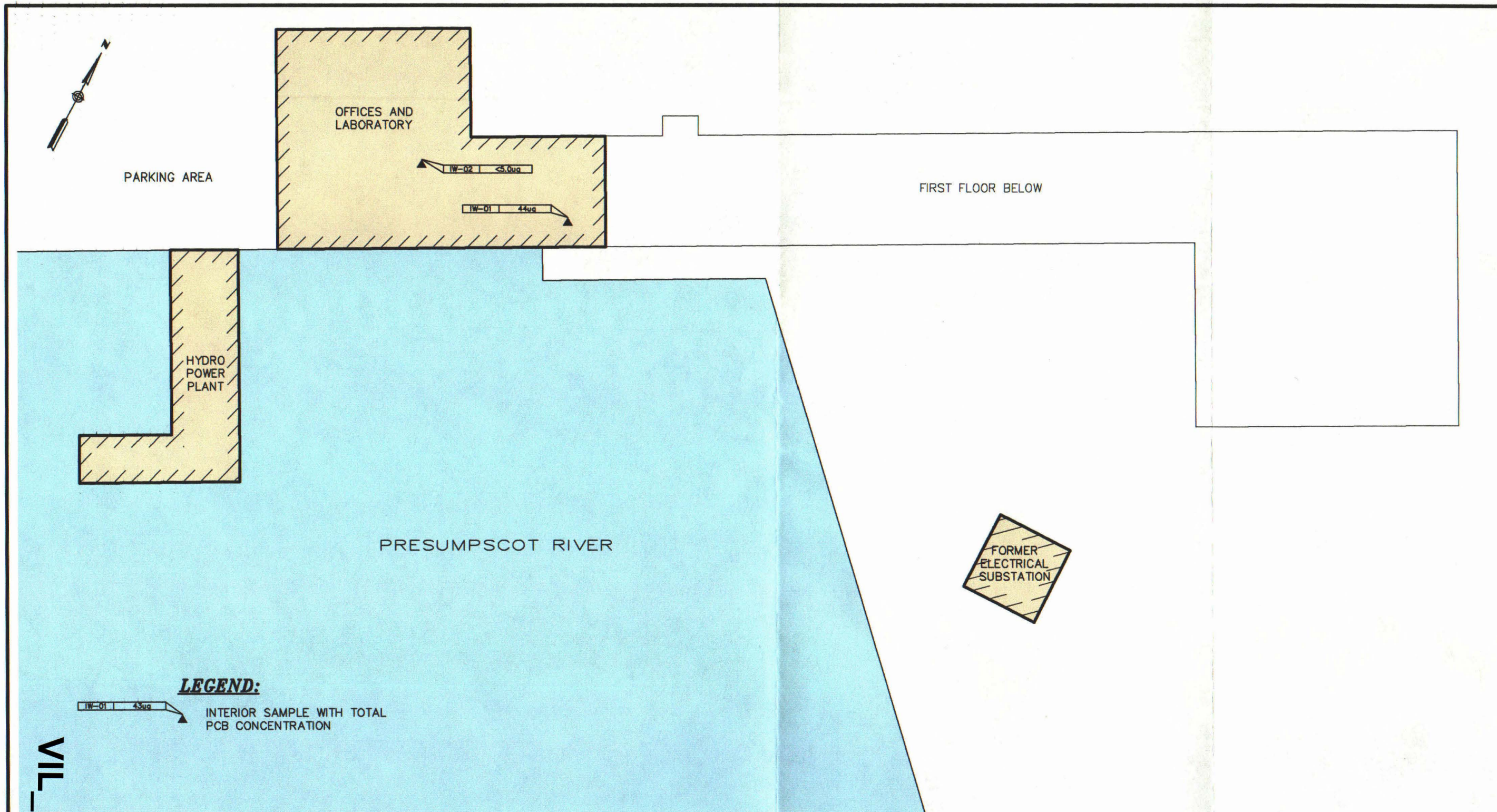
SITE:  
7 DEPOT STREET  
WINDHAM, MAINE

**PCB SAMPLE RESULTS:  
FIRST FLOOR**

DATE: APRIL 2006  
PROJECT: 046016  
FIGURE: 3

VIL  
RESP02305

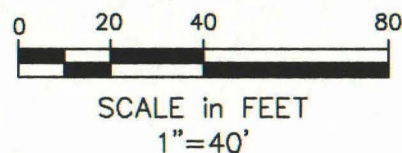




# NOTES:

1. THE PLAN BASED ON DRAWING FROM JACQUES WHITFORD COMPANY, INC. DATED SEPTEMBER 2, 2003.
2. SOME FEATURES ARE APPROXIMATE IN LOCATION AND SCALE.
3. THIS PLAN HAS BEEN PREPARED FOR VILLAGE AT LITTLE FALLS, LLC. ALL OTHER USES ARE NOT AUTHORIZED, UNLESS WRITTEN PERMISSION IS OBTAINED FROM RANSOM ENVIRONMENTAL CONSULTANTS, INC.

P:\ME\016\2004\046016\04601605B.dwg Apr 27, 2006 - 9:00am



**RANSOM** Environmental Consultants, Inc.

PREPARED FOR:

VILLAGE AT LITTLE FALLS, LLC  
PORTLAND, MAINE

SITE:

7 DEPOT STREET  
WINDHAM, MAINE

**PCB SAMPLE RESULTS:  
SECOND FLOOR**

DATE: APRIL 2006  
PROJECT: 046016  
FIGURE: 4

VIL-ESP02306



**APPENDIX A**

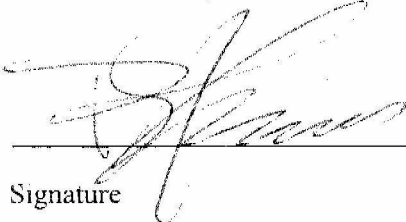
**Certification**

**VIL\_RESP02307**

### Certification

The undersigned, as owner of the property where the cleanup site is located and the party conducting the cleanup, hereby certifies that all sampling plans, sample collection procedures, sample preparation procedures, extraction procedures, and instrumental/chemical analysis procedures used to assess or characterize the PCB contamination at the cleanup site, are on file and available for EPA inspection at:

Ransom Environmental Consultants, Inc.  
400 Commercial Street, Suite 404  
Portland, Maine 04101

  
\_\_\_\_\_  
Signature

  
\_\_\_\_\_  
Title

  
\_\_\_\_\_  
Date

VIL\_RESP02308



**APPENDIX B**

**Laboratory Data Sheets**

**VIL\_RESP02309**

November 11, 2005

Ms. Lisa Haines  
Ransom Environmental Consultants, Inc.  
400 Commercial Street  
Suite 404  
Portland, ME 04101

Dear Ms. Haines:

Enclosed are analytical results for samples submitted to Pace Analytical by Ransom Environmental Consultants, Inc.. The samples were received on October 28, 2005. The results reported in this project meet the requirements as specified in Chapter 5 of the NELAC Standards. Any deviations or discrepancies from the NELAC standards are documented in the case narrative(s) of this report. Please reference Pace project number 05-6238 when inquiring about this report.

Client Site: Keddy Mill

Client Ref.: 046016

| Pace Sample Identification | Client Sample Identification |
|----------------------------|------------------------------|
| 0510-3449                  | IW-01                        |
| 0510-3450                  | IW-02                        |
| 0510-3451                  | IW-03                        |
| 0510-3452                  | IWD-01                       |
| 0510-3453                  | IS-01                        |
| 0510-3454                  | IS-02                        |
| 0510-3455                  | IS-03                        |

| Pace Sample Identification | Client Sample Identification |
|----------------------------|------------------------------|
| 0510-3456                  | IS-04                        |
| 0510-3457                  | IS-05                        |
| 0510-3458                  | IS-06                        |
| 0510-3459                  | IS-07                        |
| 0510-3460                  | IS-08                        |
| 0510-3461                  | IS-10                        |
| 0510-3463                  | Equip. Blank                 |

**General Comments:** Cooler temperature 1 ° C upon receipt. Ice was present.

Please call me if you have any questions regarding the information contained within this report.

Sincerely,



Carin A. Ferris  
Project Manager

CAM: jld

Enclosures

Page 1 of 17

**REPORT OF LABORATORY ANALYSIS**

This report shall not be reproduced, except in full,  
without the written consent of Pace Analytical Services, Inc.

**VIL\_RESP02310**